

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
UNITED STATES of AMERICA,

Action No. 1:04-cr-10286 PBS

v.

MICHAEL ALCOTT,
Defendant.

MOTION TO CONTINUE

N O W C O M E S defendant, Michael Alcott, by his counsel, and moves for an order continuing the Friday, October 21, 2005 sentencing hearing in this matter to the week of Monday, November 21, 2005. In support of this motion, counsel says as follows: The defense requires more time to prepare for sentencing, including exploration of certain departure issues anticipated in the plea agreement.

Probation has scheduled a September 26, 2005 interview date with Mr. Alcott and counsel and Probation will require more time to submit a PSR and to allow sufficient response time. AUSA Jack Pirozzolo, Esq., informs counsel that the government does not object to this motion.

Dated this 19th day of September, 2005 at Boston, Massachusetts.

/s./ Kevin L. Barron

Kevin Lawrence Barron, Mass BBO 550712
Counsel to MICHAEL ALCOTT, Defendant
453 Washington Street - 5th Floor
Boston, Massachusetts 02111-1325
Telephone No. 617-482-6368
Facsimile No. 617-517-7711
Cellular No. 617-407-6837
Electronic Mail: k@lawyerbarron.com

ELECTRONIC FILING